REMARKS

Claims 1-9 are all the claims pending in the application, with claims 1, 5 and 9 being in independent form. Upon entry of this Amendment, claims 1, 5 and 9 are amended. No new matter is presented.

In the Office Action, the Examiner objected to the drawings, rejected claims 1, 3, 5, 7 and 9 under 35 U.S.C. § 102(e) based on Bhatia et al. (U.S. Patent No. 6,829,239, hereinafter "Bhatia"), rejected claims 2 and 6 under 35 U.S.C. § 103(a) based on Bhatia in view of Wootten et al. (U.S. Patent No. 6,128,298, hereinafter "Wootten"), and rejected claims 4 and 8 under 35 U.S.C. § 103(a) based on Bhatia in view of Chitturi (U.S. Patent No. 6,760,780). The outstanding objections and rejection are addressed as follows.

Regarding the drawing objections, the Examiner indicated that Figures 1-3 should be labeled "prior art" and further indicated that Figure 2 should be corrected to change the spelling of element 12 ("NETWORK NDOE" to "NETWORK NODE"). In response, Applicant submits replacement figures for Figures 1-3 which include the prior art designation and correct the spelling of element 12. Applicant notes that replacement Figure 3 is included on the same sheet with the previous Figure 4. Therefore, Applicant respectfully requests the withdrawal of these objections.

With respect to the rejection of claims 1, 3, 5, 7 and 9 under 35 U.S.C. § 102(e) as allegedly being anticipated by Bhatia, Applicant traverses this ground of objection.

Independent claim 1 defines a novel network address conversion system for enabling access to a node of a private network which has a private IP address which is neither taught nor suggested by the prior art. For instance, a reservation unit receives an access reservation from an external network node to access a specific node of the private network. Further, claim 1 requires that an external port allocation unit allocates a first external port value to the specific node in response to the access reservation demand which is received from the external node, and transmits the first external port value to the external network node. Claim 1 additionally defines a mapping table which stores the first external port value and an address conversion unit which converts the first external port value into a private IP address of the specific node, when the external network node access the specific node by using the first external port value.

Applicant submits that Bhatia merely teaches a LAN (local area network) modem which performs network address translation of private IP addresses and port numbers to public IP address and port numbers in response to packets transmitted from a local workstation to a remote server. However, Bhatia does not provide any teaching or suggesting of at least allocating external port values in response to an access reservation demand which is received from an external node.

As taught by Bhatia, the LAN modem receives a packet from a local workstation and compares a private source port number of the packet with public source port numbers which are stored in the network address translation table. Further, if the private source port number of the packet from the local workstation has been previously assigned by the LAN modem to another

local workstation, Bhatia teaches that the LAN modem assigns a new public source port number and a public IP address to the packet. The LAN modem then stores the private source port number together with the newly assigned public port number in the network address translation table. Subsequently, the modified packet is transmitted to a remote server (i.e., the destination address). (see Bhatia at col. 16, lines 15-55).

Further, Bhaita teaches that the remote server may transmit a return packet to the LAN modem. Upon receiving the LAN modem, the return packet is modified so that the public port number is replaced with the private port number, and the packet is forwarded to the LAN workstation. (Bhatia at col. 16, lines 56-62).

However, Bhatia provides no teaching or suggestion for an access reservation demand, as defined by claim 1. Further, the external port value of Bhatia is not allocated in response to an access reservation demand received from an external node, as required by claim 1. As discussed above, Bhatia allocates an external port value in response to a receiving a packet *from the internal network* which is addressed to an external remote server. Thus, the network address translation of Bhatia is consistent with the prior art network translation described by Applicant in the background of the specification. (see specification at pages 1-5).

Therefore, Applicant submits that independent claim 1 is neither anticipated nor suggested by the prior art. Accordingly, reconsideration and withdrawal of the rejection of claim 1 is requested.

Moreover, Applicant submits that the above arguments are equally applicable to the rejection of independent claims 5 and 9, which define a network address conversion method and a recording medium for recording a network address conversion method, respectively. As discussed above, Applicant submits that Bhatia fails to teach or suggest the claimed access reservation demand and the allocation of the external port value in response to an access reservation demand received from an external node, as required by these claims. Thus, for at least these reasons, Applicant respectfully requests reconsideration and withdrawal of the rejection of independent claims 5 and 9.

Additionally, Applicant submits that dependent claims 3 and 7 are allowable at least by virtue of their respective dependency from independent claims 1 and 5, respectively. Therefore, allowance of claims 3 and 7 is requested.

With respect to the rejection of claims 2 and 6 under 35 U.S.C. § 103(a) based on Bhatia in view of Wootton, Applicant submits that these claims are allowable at least by virtue of their respective dependency from independent claims 1 and 5. Therefore, allowance of claims 2 and 6 is requested.

Further, with respect to the rejection of claims 4 and 8 under 35 U.S.C. § 103(a) based on Bhatia in view of Chitturi, Applicant submits that these claims are allowable at least by virtue of their respective dependency from independent claims 1 and 5. Therefore, allowance of claims 4 and 8 is requested.

AMENDMENT UNDER 37 C.F.R. § 1.111

U.S. Patent Application No. 09/938.507

Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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AMENDMENT UNDER 37 C.F.R. § 1.111 U.S. Patent Application No. 09/938.507

AMENDMENTS TO THE DRAWINGS

Please remove Figures 1-3 and replace with replacement Figures 1-3.

Attachment: Replacement Sheets